



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 18, 2023

BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Richard Zeitlin*, 23 Cr. 419 (LAK)

Dear Judge Kaplan:

On August 15, 2023, a grand jury sitting in this District returned an indictment charging defendant Richard Zeitlin with various fraud and obstruction-related offenses. Zeitlin was arrested on August 17, 2023, in Las Vegas, Nevada, and presented before the Honorable Cam Ferenbach, United States Magistrate Judge for the District of Nevada. On August 18, 2023, Judge Ferenbach ordered Zeitlin detained. Your Honor has set an initial pretrial conference in this matter for September 14, 2023, at 2:30 p.m.

The Government respectfully requests, with the consent of defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through the date of the initial pretrial conference. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial because it would allow the parties to begin to review and produce discovery, consider potential motion practice, and engage in discussions regarding the potential resolution of the matter without the need for trial.

The Government encloses a proposed order excluding time for the Court's consideration.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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Cc: Robert Bernhoft, Esq. (via email)